

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Jesus Jose Palmeroni, A/K/A Joseph Palmeroni,
D/B/A, JJP Consulting, LLC

Debtor(s).

Civil Action No. 5:16-bk-3073-JJT

**PETITION FOR SPECIAL
ADMISSION *PRO HAC VICE*
PURSUANT TO BANKRUPTCY
LOCAL RULE 2090-1**

PETITION FOR SPECIAL ADMISSION

I, Aidan P. O'Connor, hereby petition the United States Bankruptcy Court for the Middle District of Pennsylvania for special admission to practice before the Court. In support of my petition, I state as follows:

My office address is: Pashman Stein Walder Hayden
21 Main Street, Suite 200
Hackensack, NJ 07601-7054
Email: aoconnor@pashmanstein.com
Office Telephone: 201-488-8200

I was admitted to practice before the Courts listed below on the date shown after the name of each Court, and I am currently a member in good standing of all those Courts.

New Jersey 08/09/1991

Eastern District of New York 06/11/1987

New York 04/13/1987

Third Circuit Court of Appeals 11/2012

District of New Jersey 09/02/2008

Second Circuit Court of Appeals 12/18/2012

Southern District of New York 05/26/1987

My attorney Identification number is: 00037-1991 NJ; 2127413 NY.

FOR COURT USE ONLY

____ GENERAL ADMISSION:

GRANTED BY THE COURT: _____ Date: _____

____ SPECIAL ADMISSION:

GRANTED BY THE COURT _____ Date: _____

Please Answer the Following Questions:

All occasions, if any, on which I have been convicted of a crime (subsequent to my becoming an attorney), censured, suspended, disciplined or disbarred by any court are set forth as follows: (State the facts and circumstances connected with each; if none, state "none".)

None.

All occasions, if any, on which I have been held in contempt of court are set forth as follows: (State the nature and final disposition of contempt; if none, state "none".)

None.

I do not have any disciplinary action, contempt or other proceedings involving me pending before any court.

I am seeking:

 General Admission under Local Rule LR 83.8.1

 X Special Admission under LR 83.8.2.1 and BLR 2090-1.

NAME THE PARTY YOU REPRESENT:

Creditor, N.V.E., Inc.

If special admission is requested for a particular case, please list case number and caption:

Case #: 5:16-bk-03073-JJT

Caption: In re: Jesus Jose Palmeroni

I understand that:

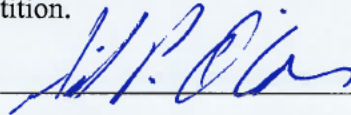
- 1) If seeking admission under Section LR 83.8.2.2, LR 83.8.2.3, or 83.8.2.4, I must submit a letter from a superior stating the agency with which I am employed and the duties performed which qualify me for admission under those sections.
- 2) If petitioning for admission, only in a particular case, under Rule LR 83.8.2.1, I need no sponsor's certificate. Any attorney specially admitted under LR 83.8.2.1, shall, in each proceeding in which he or she appears, have associate counsel who is generally admitted under Local Rule 83.8.1 to practice in this court, whose appearance shall also be entered of record and upon whom all pleadings, motions, notices, and other papers may be served in accordance with any statute or applicable rule. The attendance of any such associate counsel upon the hearing of any motion or the taking of any testimony shall be sufficient appearance for the party or parties represented by such associate counsel. Either the specially admitted attorney or associate counsel must be fully prepared to participate in any hearings, arguments, conferences and trials. (See LR 83.9)

If special admission is requested for a particular case, please list the name, address, telephone number and bar identification number of associate counsel to be entered of record in the case:

Peter G. Erdely
Law Offices of Peter G. Erdely LLC
1500 Market Street, 12th Floor, East Tower
Phila., PA 19102
215-665-5650.
PA Bar ID. 79993

- 3) If seeking general admission under Rule LR 83.8.1, I must be a member of the bar of the Supreme Court of Pennsylvania and have a sponsor who is a member in good standing of the Bar of this Court present to move for my admission and I must submit the sponsor's certificate with my petition.

PETITIONER SIGNATURE: _____



Bar ID and State where admitted: 00037-1991 New Jersey

Date: 10/13/16

By signing this petition for admission, I acknowledge that I have read the attached Middle District of Pennsylvania Code of Professional Conduct and agree to subscribe to the standards set forth in the Code.

NAME OF PETITIONER: Aidan P. O'Connor

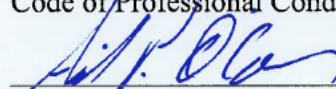
**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

CODE OF PROFESSIONAL CONDUCT

As a member of the Bar of the United States District Court for the Middle District of Pennsylvania, I will strive for the following professional ideal:

1. The rule of law will govern my entire conduct. I will not violate the law or place myself above the law.
2. I will treat with civility and respect the lawyers, clients, opposing parties, the court and all the officials with whom I work. Professional courtesy is compatible with vigorous advocacy and zealous representation. Even though antagonism may be expected by my client, it is not part of my duty to my client.
3. I will respect other lawyers' schedules as my own, and will seek agreement on meetings, depositions, hearings, and trial dates. A reasonable request for a scheduling accommodation should never be unreasonably refused.
4. Communications are life lines. I will keep the lines open. Telephone calls and correspondence are a two-way channel; I will respond to them promptly.
5. I will be punctual in appointments, communications and in honoring scheduled appearances. Neglect and tardiness are demeaning to others and to the judicial system.
6. I will earnestly attempt to resolve differences through negotiation, expeditiously and without needless expense.
7. Procedural rules are necessary to judicial order and decorum. I will be mindful that pleadings, discovery processes and motions cost time and money. I will not use them heedlessly. If an adversary is entitled to something, I will provide it without unnecessary formalities.
8. I will not engage in conduct that brings disorder or disruption to the courtroom. I will advise my client and witnesses appearing in court of the proper conduct expected and required there and, to the best of my ability, prevent my client and witnesses from creating disorder or disruption.
9. Before dates for hearings or trials are set, or if that is not feasible immediately after such date has been set, I will attempt to verify the availability of necessary participants and witnesses so I can promptly notify the court of any likely problems.

I agree to subscribe to the above
Code of Professional Conduct:



Signature

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

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D/B/A, JJP Consulting, LLC

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Debtor(s).

SPONSOR'S CERTIFICATE

I, Peter G. Erdely, am a member in good standing of the Bar of the United States District Court for the Middle District of Pennsylvania, having been admitted to practice on (month) May (day) 22nd, (year) 2001.

I have known the above petitioner for one year. To my knowledge, the petitioner's moral character is as follows: Honest and upstanding.

To my knowledge, the petitioner's educational background and experience include:

- J.D., University of Virginia Law School, 1986.
- 18 years as an Assistant United States Attorney in District of New Jersey.
- Member of Pashman Stein Walder Hayden in Hackensack, NJ.

I sponsor and recommend Aidan P. O'Connor for special admission to practice before this court.

s/Peter G. Erdely
(sponsor)
PETER G. ERDELY
PA Bar ID. 79993
Law Offices of Peter G. Erdely LLC
1500 Market Street,
12th Floor, East Tower
Philadelphia PA 19102
Telephone: 215-665-5650
Facsimile: 215-689-0198
peter@erdelylaw.com
Attorney for Creditor N.V.E., Inc.

Date: 10/13/2016

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petition for Special Admission *Pro Hac Vice* was filed electronically on this date via the United States Bankruptcy Court, Middle District of Pennsylvania, Electronic Case Filing system. The document is available for viewing and downloading from the ECF system. The document is being served via ECF system on:

United States Trustee, 228 Walnut Street, Suite 1190, Harrisburg, PA 17101

Charles J. DeHart III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA 17036

Randall W. Turano, Attorney for Jesus Jose Palmeroni, AKA Joseph Palmeroni, DBA JJP Consulting, LLC, 802 Monroe Street, Stroudsburg, PA 18360, rwtura@netscape.net

Karina Velter, Attorney for Creditor U.S. Bank National Association, Manley Deas Kochalski, LLC, P.O. Box 165028, Columbus, Ohio 43216-5028 Amps@Manleydeas.Com

Date: 10/22/2016

s/Peter G. Erdely

PETER G. ERDELY

PA Bar ID. 79993

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1500 Market Street,

12th Floor, East Tower

Philadelphia PA 19102

Telephone: 215-665-5650

Facsimile: 215-689-0198

peter@erdelylaw.com

Attorney for Creditor N.V.E., Inc.